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AO 91 (Rev. 11/11) Criminal Complaint (approved by AUSA

Laurie Magid 18-99

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

Carlos Ramos

Case No.

18-1455-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 12, 2018 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

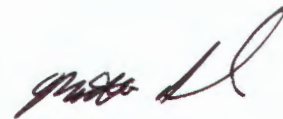
Offense Description

21 U.S.C. 846, 841(a), (b)(1)(B), 18
 USC 2

Attempt to possess with intent to distribute a controlled substance (500 grams or
 more of cocaine), and aiding and abetting.

This criminal complaint is based on these facts:
 See attached Affidavit.

☐ Continued on the attached sheet.



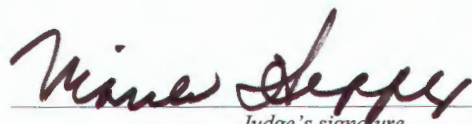
Matthew Lynch

Complainant's signature

United States Postal Inspector

Printed name and title

Sworn to before me and signed in my presence.

Date: September 12, 2018


Judge's signature

City and state: Philadelphia, PA

Honorable Marilyn Heffley

Printed name and title

Attachment A

On or about September 12, 2018, in Philadelphia, in the Eastern District of Pennsylvania, defendant CARLOS RAMOS knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the possession with intent to distribute, 500 grams or more, that is approximately one kilogram, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.

A F F I D A V I T

Matthew A. Lynch II, being duly sworn, deposes and says:

1. I am currently assigned to the United States Postal Inspection Service, Philadelphia Division. I have been employed as a Postal Inspector since August 2017. Prior to becoming a Postal Inspector, I was employed as a Police Officer with the Upper Darby Township Police Department for four years. I have a Bachelor of Arts in United States History from The University of Albany in Albany, NY. As part of my duties as a United States Postal Inspector, I investigate the use of the U.S. Mail to illegally transport controlled substances and drug trafficking, in violation of Title 21, United States Code, Sections 841(a)(1) and 846. I have been trained in various aspects of law enforcement, including the investigation of narcotics offenses. Through my education and experience and that of other agents assisting in this investigation, I have become familiar with the methods that individuals use to traffic narcotics through the U.S. Mail.
2. On September 11, 2018, U. S. Postal Inspectors in Philadelphia intercepted a suspicious parcel, Priority Mail Parcel Number 9505510705238253170187. The parcel is addressed to "Carmelo Roman", 3402 H Street, Philadelphia, PA 19134 and has a return address of "Edgar Santo", C/30 AH 11, Villas De Loiza, Canovanas P.R. 00729.
3. The parcel was mailed on September 10, 2018, from Carolina, Puerto Rico. The parcel is a Priority Mail Flat Rate box which measures approximately 12" x 12" x 5.5" and weighs approximately 8 pounds 2 ounces.
4. Investigation of the return address sender of the Subject Parcel, through Postal Service records, does not exist. From my training and experience, and the experience of other agents, I know that drug dealers who are sending controlled substances by the mail or other package delivery services will often use an incorrect return address and/or a fictitious return addressee name when they are shipping parcels containing


controlled substances. They use this subterfuge in order to prevent the mailer of the package from being located.

5. On September 12, 2018, the Subject Parcel was exposed to a drug detection canine named "Quattro." Quattro is handled by Officer Robert Bennett Badge # 22 with the Upper Darby Township Police Department. Officer Bennett has been with the Upper Darby Township Police Department since 2007 and he has been a K9 handler since 20014. The North American Police Working Dog Association (USPCA) along with the United States Police Canine Association certifies Officer Bennett and K9 Quattro on an annual basis, and Officer Bennett and K9 Quattro have ongoing maintenance training every month during the year. In November 2017, Officer Bennett and K9 Quattro successfully completed the certification and are certified in the detection of the following substances: marijuana, crack cocaine, cocaine, and heroin and was certified in the detection of these same substances by the USPCA in April 2018. Officer Bennett advised Postal Inspectors that Quattro alerted positive to the presence of illegal narcotics inside the Subject Parcel.
6. On September 12th, 2018, the Honorable Marilyn Heffley, U.S. Magistrate Judge for the Eastern District of Pennsylvania, issued a federal search warrant (18-1439) to search Priority Mail Parcel No. 9505510705238253170187 Postal Inspectors opened the Subject Parcel and found it to contain baby food and a bundle of black bed sheets. Concealed in the middle of the bundle of black bed sheets was a rectangular shaped item that was covered in black carbon paper and vacuum sealed plastic material. The rectangular shaped item was composed of a white substance (suspected cocaine) and weighed approximately one kilogram. The suspected cocaine was field tested and tested positive for the presence of cocaine. The estimated street value of a kilogram of cocaine is approximately \$100,000 U.S. dollars.
7. On September 12th, 2018, the Honorable Marilyn Heffley signed a subsequent warrant authorizing the installation and monitoring, in private areas, including but not limited

to private residences and vehicles, a beep transponder device and a Global Positioning System ("GPS") device, which were both placed in the Parcel

8. On September 13, 2018, U.S. Postal Inspectors conducted a controlled delivery of the aforementioned parcel described above to 3402 H Street, Philadelphia, PA 19134, the address on the parcel. Prior to delivery, law enforcement removed the suspected cocaine from the parcel and replaced it with a sham substance similar in appearance to the original contents of the package, but containing only a portion of the cocaine recovered from the parcel. Law enforcement also placed theft detection on the outside of the kilogram. The theft detection powder is invisible to the naked eye, but can be seen using an ultraviolet light. Law-enforcement uses theft detection powder in order to determine what individuals have touched an object. Along with the sham substance, at the time of delivery, the parcel also contain tracking devices, which are used to monitor the whereabouts of the parcel in question at all times, and a beeper when the parcel was opened.
9. At approximately 11:32 AM, the parcel was delivered to 3402 H Street, Philadelphia, PA 19134, by being handed to an individual, later identified as Carlos Ramos. Ramos then took the parcel into the front door of 3402 H Street, Philadelphia, PA 19134
10. At approximately 11:38 AM, the parcel alarm activated indicating that the wire on the Parcel was broken, consistent with it having been opened inside the house.
11. Postal Inspectors then knocked at front door of 3402 H Street, Philadelphia, PA 19134, and announced their presence. No one came to the door. An officer in the alley to the rear of the subject location observed an arm, dressed in what appeared to be the white jacket worn by Ramos, throw the sham brick from the second floor back bedroom on to the property north of the subject location.

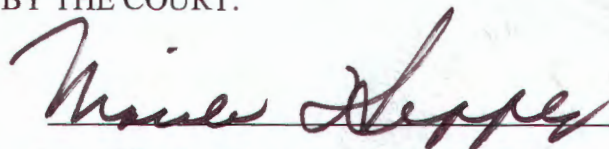
12. Once officers were inside the residence they encountered Ramos walking out of the second floor back bedroom. Two other individuals were detained at the location. Only Ramos was wearing a white jacket.
13. At approximately 11:50am, Ramos's hands tested positive for the presence of theft detection powder. This indicates that Ramos handled the sham brick.
14. Based on the above facts, there is probable cause to believe that Carlos Ramos knowingly and intentionally attempted to possess with intent to distribute, and aided and abetted the possession with intent to distribute, 500 grams or more, that is approximately one kilogram, of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(B), in violation of Title 21, United States Code, Section 846, and Title 18, United States Code, Section 2.



Matthew A. Lynch II
U.S. Postal Inspector

Sworn and subscribed before me
this 13th day of September, 2018:

BY THE COURT:



HONORABLE MARILYN HEFFLEY

United States Magistrate Judge